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June 8, 2004

Michael O. Leavitt, Administrator
US Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Subject: Comments on the HPV test plan for Sodium Lauryl Sulfoacetate

Dear Administrator Leavitt:

The following are comments on the test plan for sodium lauryl sulfoacetate (CAS # 1847-58-1) for the HPV program, submitted by Stepan Company. These comments are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal, health and environmental protection organizations have a combined membership of more than ten million Americans.

Stepan proposes to do an OECD 421 screening protocol on this chemical, which will kill approximately 675 animals.

This test plan is a clear example of a major problem with the HPV program: the continued acceptability of check-the-box toxicology despite EPA guidance to the contrary (please see *http://www.epa.gov/chemrtk/ceoltr2.htm*). In this case, there has been no attempt to use physicochemical data or behavior to bridge mammalian toxicity data with other similar chemicals. For example, a similar chemical, the detergent sodium dodecyl sulfate (SDS) is a ubiquitous and data rich chemical. Data from SDS or other similar detergents and sodium salts should be used to help inform the total knowledge base of sodium lauryl sulfoacetate.

In fact, no consideration appears to have been given to the overall knowledge base of sodium lauryl sulfoacetate. As the chemical is a cosmetic ingredient in personal care products, care should be taken to determine whether it is really necessary or even useful to conduct the tests proposed, considering its history of use. As stated in the above-referenced EPA letter to HPV sponsors:

> "In analyzing the adequacy of existing data, participants shall conduct a thoughtful, qualitative analysis rather than use a rote checklist approach. Participants may conclude that there is sufficient data, given the totality of what is known about a chemical, including human experience, that certain endpoints need not be tested.... As with all chemicals, before generating new information,

participants should further consider whether any additional information obtained would be useful or relevant."

Thank you for your attention to this issue. I look forward to a prompt and favorable response to our concerns. I can be reached at 202-686-2210 ext. 335 or via email at *kstoick@pcrm.org*.

Sincerely,

Kristie Stoick, MPH
Research Analyst

Chad B. Sandusky, PhD
Director of Research